

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

SIERRA CLUB, INC. and
CONSERVATION LAW FOUNDATION,
INC.,

Plaintiffs,

v.

GRANITE SHORE POWER LLC, et al.,

Defendants.

No. 1:19-cv-00216-JL

DEFENDANTS' ASSENTED TO MOTION TO EXTEND TIME TO
REPLY TO OBJECTION TO MOTION FOR
PARTIAL SUMMARY JUDGMENT ON COUNT V TO JUNE 4, 2020

Defendants Granite Shore Power LLC, GSP Merrimack LLC, (the "Defendants"),¹ with the assent of counsel for Plaintiffs, hereby move to extend the time to reply to Plaintiffs' Objection to Defendants' Motion for Partial Summary Judgment on Count V to June 4, 2020. As grounds for this Motion, the Defendants state as follows:

1. On March 17, 2020, Defendants filed a Motion for Partial Summary Judgment on Count V of the Plaintiffs' Complaint. Plaintiffs filed their Objection to the Motion on May 14, 2020.

2. Defendants' Reply to Plaintiffs' Objection to Motion for Summary Judgment is currently due on May 21, 2020.

¹ PSNH was dismissed from this lawsuit by a Stipulation of Dismissal dated February 18, 2020.

3. Defendants require additional time to respond to Plaintiffs' Objection and requests that the Court extend the time to file their Reply to June 4, 2020.

4. Counsel for Plaintiffs assents to the relief sought in this motion and have requested that they be granted an extension to file a Surreply to June 14, 2020. Defendants assent to that extension.

5. These brief extensions will not result in the continuance of any currently scheduled hearing, conference or trial.

6. No memorandum of law is required since the relief sought is within the discretion of the Court.

WHEREFORE, the Defendants respectfully request that this Honorable Court enter an Order:

(A) Granting an extension of time to June 4, 2020 for Defendants to file a Reply to Plaintiffs' Objection to Defendants' Motion for Partial Summary Judgment on Count V;

(B) Granting Plaintiffs until June 14, 2020 to file a Surreply to Defendants' Reply; and

(C) Granting such further relief as may be just, equitable and appropriate.

Respectfully submitted,

GRANITE SHORE POWER LLC, GSP
MERRIMACK LLC, and PUBLIC SERVICE
COMPANY OF NEW HAMPSHIRE d/b/a
EVERSOURCE ENERGY

By their attorneys,

McLANE, GRAF, RAULERSON & MIDDLETON,
PROFESSIONAL ASSOCIATION

Date: May 18, 2020

By: /s/ Wilbur A. Glahn, III
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Certificate of Rule 7.1(c) Compliance

I certify that Reed Super, counsel for plaintiffs, assents to the relief sought in this Motion.

/s/ Wilbur A. Glahn, III
Wilbur A. Glahn, III

Certificate of Service

I hereby certify that on May 18, 2020, I served the foregoing Motion electronically through ECF upon all counsel of record.

/s/ Wilbur A. Glahn, III
Wilbur A. Glahn, III